

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE: RANBAXY GENERIC DRUG APPLICATION
ANTITRUST LITIGATION

MDL No. 2878

THIS DOCUMENT RELATES TO:

All End-Payor Actions

Master File No.
19-md-02878-NMG

**END-PAYOR PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY
APPROVAL OF THE PROPOSED SETTLEMENT**

Pursuant to Rules 23 of the Federal Rules of Civil Procedure, Plaintiffs United Food and Commercial Workers Health and Welfare Fund of Northeastern Pennsylvania (“UFCW”), Louisiana Health Service & Indemnity Company d/b/a Blue Cross and Blue Shield of Louisiana and HMO Louisiana, Inc. (“BCBSLA”) (collectively, the “Plaintiffs,”), on behalf of themselves and the certified End-Payor Classes they represent (the “End-Payor Classes” or “EPPs”), hereby move this Court for an Order: (i) preliminarily approving the Settlement; (ii) approving the Plan of Allocation; (iii) approving the proposed notice to the Class; (iv) appointing A.B. Data, Ltd. to serve as Settlement Administrator; (v) appointing Citibank, N.A. to serve as the Escrow Agent; (vi) setting a schedule for final approval of the Settlement; (vii) staying EPPs’ litigation against Defendants; and (viii) granting such other and further relief as may be deemed just and proper. The grounds for this Motion are set forth in the accompanying Memorandum of Law in Support of End-Payor Plaintiffs’ Motion for Preliminary Approval of the Proposed Settlement, and the Joint Declaration of Renee A. Nolan and James R. Dugan, II, dated April 22, 2022, and all Exhibits attached thereto.

Defendants do not oppose the motion. The parties to the Settlement have agreed upon a proposed order granting the relief sought by this Motion that is attached herewith.

Dated: April 22, 2022

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on April 22, 2022, a true copy of the foregoing document was served on all counsel of record by electronic transmission and/or electronically filing the document with the Court's CM/ECF system.

/s/Renee A. Nolan